



State of New Jersey

OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 112
TRENTON, NJ 08625-0112

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

MATTHEW J. PLATKIN
Attorney General

MICHAEL T.G. LONG
Director

March 22, 2023

Via ECF Only

The Honorable Lois H. Goodman, U.S.M.J.
Clarkson S. Fisher Fedl. Bldg. & U.S. Cthse.
Room 7050
402 E. State Street
Trenton, NJ 08608

Re: Kyhallista Johnson v. State of New Jersey, at
al.
Docket No.: 3:18-cv-11299-GC-LHG

Dear Judge Goodman:

This office represents the State Defendants, the State of New Jersey, the New Jersey Department of Law and Public Safety, Division of State Police, and John T. Nichols, in the above-referenced matter. Pending before the Court is Plaintiff's Motion to Amend the Complaint, returnable April 3, 2023.

The State Defendants join in the opposition filed by co-defendants City of Long Branch and Brian O'Gibney (ECF No. 93) and urge the Court to deny the Motion to Amend for the reasons advanced therein.

Thank you for your time and consideration.



Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Leah E. Traub
Leah E. Traub
Deputy Attorney General

cc: All Counsel of Record (via ECF)